

# **EXHIBIT D**

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: AMERICAN MEDICAL COLLECTION)

AGENCY, INC., CUSTOMER DATA )

## SECURITY BREACH LITIGATION

## VIDEOTAPED and REMOTE DEPOSITION OF

JEFFREY S. WOLLMAN

DATE: February 19, 2023

TIME: 9:03 a.m.

PLACE: DoubleTree by Hilton Hotel Norwalk

789 Connecticut Avenue

Norwalk, Connecticut

By: Sarah J. Miner, RPR, LSR

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1 A P P E A R A N C E S:

2 For the Plaintiffs:

3 Stuart A. Davidson, Esq. (Appearing via Zoom)

4 Robbins Geller Rudman & Dowd, LLP

5 225 NE Mizner Boulevard, Suite 720

Boca Raton, Florida 33432

6

and

7

Christopher Ayers, Esq.

8 Frazer Thomas, Esq. (Appearing via Zoom)

SeegerWeiss LLP

9

55 Challenger Road

Ridgefield Park, New Jersey 07660

10

For the Defendant Quest Diagnostics, Incorporated:

11 Heather Sultanian, Esq.

12 Rachel C. McKenzie, Esq. (Appearing via Zoom)

Sidley Austin, LLP

One South Dearborn

13 Chicago, Illinois 60603

14

For the Defendant, CareCentrix, Inc.:

15

William S. Brown, Esq.

16 Nelson Mullins, LLP

2 West Washington Street, Suite 400

17 Greenville, South Carolina 29601

18

For the Defendant, Laboratory Corporation of

19 America Holdings:

20 Adam A. Cooke, Esq.

Hogan Lovells, LLP

21 555 Thirteenth Street, NW

Washington, D.C. 20004

22

23

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1 A P P E A R A N C E S:

2 For the Defendant, Optum360, LLC:

3 Troy Stram, Esq.

4 Alston & Bird, LLP

5 90 Park Avenue, 12th Floor

6 New York, New York 10016

7

8 For the Defendant, Sonic Healthcare USA, Clinical  
9 Pathology Laboratories, Inc., Aurora Diagnostic  
10 LLC, and Austin Pathology Associates:

11 Ariadne Panagopoulou, Esq.

12 Lewis Brisbois Bisgaard & Smith, LLP

13 77 Water Street, Suite 211

14 New York, New York 10005

15

16 For the Witness:

17 Richard Weinberg, Esq.

18 Alex Peacocke, Esq.

19 Morville Abramowitz Grand Iason & Anello, P.C.

20 565 Fifth Avenue

21 New York, New York 10017

22

23 Also Present

24 Rocco Mercurio, Videographer

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1                   THE VIDEOGRAPHER: We are now going  
2                   on the record. Today is February 19,  
3                   2023, and the time is approximately 9:03.  
4                   This is the video deposition of Jeffrey  
5                   Wollman in the matter of In Re: American  
6                   Medical Collection Agency, Quest, filed in  
7                   the U.S. District Court of New Jersey,  
8                   Docket Number 19-md-2904-DMJ.

9                   My name is Rocco Mercurio, and the  
10                  court reporter is Sarah Miner, and we are  
11                  with Veritext. We are located at the  
12                  Doubletree by Hilton Hotel in Norwalk,  
13                  Connecticut.

14                  All appearances will be noted on the  
15                  stenographic record.

16                  The court reporter will now swear in  
17                  the witness and we can proceed.

18                  JEFFREY S. WOLLMAN,  
19                  having first been duly sworn by Sarah J. Miner,  
20                  LSR, a Notary Public in and for the State of  
21                  Connecticut, was examined and testified as follows:

22                  DIRECT EXAMINATION

23                  BY MR. BROWN:

24                  Q     Mr. Wollman, my name is William Brown. We  
25                  met just a few minutes ago. I represent a company

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1                   THE WITNESS: The company -- I would  
2                   say the original system of the company was  
3                   the mainframe oriented system. And all  
4                   client reporting, or most of it came from  
5                   that system. So it was the primary source  
6                   of incoming data from clients. It  
7                   processed all of our files that would be  
8                   used for sending debt collection letters  
9                   to consumers.

10                  So its main functions were to be  
11                  primary -- to be the primary system of the  
12                  company, housing information for client  
13                  reporting, letters, transactions to be  
14                  posted to customer accounts. That was the  
15                  main system of record, I would call it.

16 BY MR. AYERS:

17 Q                So earlier -- earlier, you had -- there  
18                was some testimony related to HCFA's.

19                And could you describe what are those  
20                forms?

21 A                The HCFA 1500 form is a document that --  
22                especially before electronic insurance filing, was  
23                used to disseminate billing information to submit  
24                to an insurance carrier for payment. And it also  
25                served as -- dual purpose. It also served as an

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1 itemized statement of services provided. So that  
2 could be provided to a consumer, debtor.

3 Q So when you are describing the mainframe  
4 system, would the data that is in the mainframe  
5 system be used to fill out those HCFA forms?

6 MR. COOKE: Objection to form.

7 THE WITNESS: Yes, I believe that the  
8 mainframe system was used to create the  
9 files for those HCFA 1500 forms.

10 BY MR. AYERS:

11 Q And then -- and then on the other side,  
12 there was the non-mainframe database, which was  
13 CHAMP?

14 MR. COOKE: Objection.

15 MS. SULTANIAN: Objection as to form.

16 BY MR. AYERS:

17 Q Is that correct?

18 A It was a system that was developed for  
19 other collection purposes, correct.

20 Q So just so we get the record clear. So  
21 there was a mainframe system that was used for the  
22 reporting and what you just described and then  
23 there was the non-mainframe portion.

24 And what -- what did the non-mainframe  
25 portion consist of?

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1 Q Was -- did AMCA use CHAMP as a means of  
2 distinguishing itself from its competitors?

3 A I don't know the answer to that.

4 Q Do you know if AMCA ever marketed itself  
5 to defendants with CHAMP?

6 A I am not aware of that.

7 Q By design, CHAMP is designed to be  
8 accessed from the internet. Correct?

9 MR. COOKE: Objection to form.

10 THE WITNESS: Not being technical, I  
11 think there were portions of CHAMP that  
12 were internal, meaning only internal  
13 employees had access to certain things.  
14 Externally, I believe certain clients may  
15 have had access into their patient  
16 accounts on that system.

17 And then I believe consumers could  
18 make a payment through a secondary system  
19 of CHAMP, you know, as a payment portal to  
20 make payments.

21 BY MR. AYERS:

22 Q And CHAMP was designed to speak with  
23 various other parts of AMCA networks?

24 MS. SULTANIAN: Objection to form.

25 MR. COOKE: Objection to form. Lacks